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MICHIGAN HOUSE OF REPRESENTATIVES

JERRY O. KOOIMAN

STATE REPRESENTATIVE April 3, 2001

COMMITTEE: APPROPRIATIONS

SUBCOMMITTEES:
TRANSPORTATION, VICE CHAIR
COMMUNITY COLLEGES, VICE CHAIR
CAPITAL OUTLAY

FAMILY INDEPENDENCE AGENCY

Mr. Michael Powell, Chairman Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: Michigan Public Service Commission Petition: CC Docket No. 99-200

Dear Mr. Powell:

I am writing to express my concern over the alarming rate at which Michigan area codes are exhausting available numbers. Since 1994 four area codes have been added with at least three more in need of relief. One of those area codes (616) encompasses the area I represent in the Michigan House and went through a geographical split in October of 1999. The 616 area code is again being reviewed for a subsequent geographical split or an overlay. The most optimistic projection is that we will need another split in six years.

Recently, the Michigan Public Service Commission submitted a formal request asking the FCC to grant the Grand Rapids and Detroit Metropolitan Statistical Areas (MSA) the ability to extend the life of existing and newly created area codes through 1,000 block number distribution and participation in the initial round of proposed national number pooling.

Under your guidelines for such approval you specify that the numbering plan area must be in jeopardy, have a remaining lifespan of at least one year and that the numbering plan area is in one of the largest MSA's. The Grand Rapids and Detroit MSAs currently meet your criterion for eligibility.

Therefore, I believe that it is reasonable that the Federal Communications Commission grant the Michigan Public Services Commission's request to begin number conservation techniques that will save Michigan businesses millions of dollars in unnecessary costs.

As you are aware, the addition of new area codes whether through a geographic split or an overlay, as proposed in Grand Rapids, is costly to businesses and their employees. I also believe that the added confusion makes the overlay alternative the least attractive option for area code relief. It is important to state again that any area code solution short of number conservation mechanisms will cost businesses needed capital to expand and create jobs.

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A report to the Ad Hoc Telecommunications Users Committee stated that the available area codes, under a 10 number dialing plan, could be completely exhausted by 2007 if nothing is done. If additional numbers are added to the dialing plan to create more available numbers, the cost to businesses nationally could reach \$150 billion. It is imperative that the FCC take action to reduce the rate of area code exhaustion and the necessity for 11 or 12 number dialing plans.

The same study also shows that the proper implementation of number conservation mechanisms could extend the life of the current 10 number dialing plans to at least the year 2048 and possibly as far into the future as 2097.

Thank you for your consideration of this matter. If you have any questions, please do not hesitate to contact me directly at (517) 373-2668.

Jerry O. Kooiman
State Representative
District 75

cc:

Commissioner Harold Furchtgott-Roth Federal Communications Commission 445 12th Street SW Washington, DC 20554

Commissioner Gloria Tristani Federal Communications Commission 445 12th Street SW Washington, DC 20554

Commissioner Susan Ness Federal Communications Commission 445 12th Street SW Washington, DC 20554

Ms. Magalie Roman Salas (Five copies)
Secretary
Federal Communications Commission
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445 12th Street SW
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Washington, DC 20554

Ms. Carmell Weathers (Two copies)
Network Services Division
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International Transcription Services 445 12th Street SW Room CY-B402 Washington, DC 20554

Mr. David Voges Assistant Attorney General Public Service Division 6545 Mercantile Way, Suite 15 Lansing, MI 48911

Mr. Harvey L. Reiter Mr. David D'Alessandro Ms. Carrie L. McGuire Morrison & Hecker L.L.P. Send the preceding to the FCC with a one-page cover letter, as follows:

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Ex Parte Letter Re: File Nos. NSD-L-01-36 (Michigan)

CC Docket Nos. 96-98 and 99-200)

Dear Secretary Salas:

Enclosed are five (5) copies of an ex parte presentation in the above-referenced proceeding.

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